

EXHIBIT 1

From: [L. Timothy Fisher](#)
To: [Metanat, Morvarid](#)
Cc: [Scott A. Bursor](#); [Sutton, Theresa A.](#); [Cooper, Monte](#); [Dalton, Amy](#); [Neal Deckant](#)
Subject: Facebook v. Power
Date: Wednesday, November 02, 2011 12:42:28 PM

Dear Morvarid:

Defendants are prepared to produce a significant number of additional documents including e-mails, board, minutes, organization charts, PowerPoint presentations and software documentation. You can download the documents as follows:

IP: 206.214.217.143

protocol: FTP

port: 21

username: bffiles

pass: fileshare

The documents are segregated into two folders: (1) PowerProductions/Emails and (2) PowerProductions/Other Documents. The "e-mails" folder is complete and ready to be downloaded now. The "other documents" folder is still uploading, but should be done by the middle of the afternoon. Please contact us if you have any problems downloading the documents.

Defendants also designate these documents as "Highly Confidential - Attorneys' Eyes Only."

Tim

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On Tue, Nov 1, 2011 at 3:03 PM, Metanat, Morvarid <mmetanat@orrick.com> wrote:

Tim,

I have not received a response from you regarding the additional information and documents Mr. Vachani promised to produce during his July 20th deposition. We expect to raise this issue with the Court at Friday's hearing, unless we receive the promised materials beforehand. Please let us know if you do not intend to produce these materials and, if not, why not so that we may apprise Magistrate Judge Spero.

Best,

Morvarid

From: Metanat, Morvarid
Sent: Friday, October 14, 2011 4:18 PM
To: 'L. Timothy Fisher'; Scott A. Bursor
Subject: Supplemental production and information promised by Steve Vachani during his 7/20 deposition

Tim,

As you know, Steve Vachani made numerous promises during his July 20, 2011 deposition to provide Facebook with additional information and documents. I have attached a chart that identifies Mr. Vachani's promises. Nearly three months have passed since Mr. Vachani agreed to produce these materials, yet they have not been produced. All of this information is responsive to Facebook's Interrogatories and Requests for Production served on Power and Vachani. For example, Request Nos. 1, 2, 8, 11, 23, 27, 28, and 40 of Facebook's First Set of Requests for Production To Defendant Power Ventures, Inc., and Requests Nos. 2, 3 and 19 of the First Set of Requests for Production To Defendant Steve Vachani. This list is not exhaustive.

Please immediately produce this information. If the materials no longer exist, please confirm that Mr. Vachani did in fact conduct the additional searches as promised and explain why the information is no longer available.

Please let us know by close of business Monday when Mr. Vachani will produce these materials. Thank you.

Morvarid



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